

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION**

NICHOLE HARRIS, on behalf of The Suter  
Company, Inc. Employee Stock Ownership  
Plan, and on behalf of a class of all other  
persons similarly situated,

Plaintiff,

v.

Case No. 3:23-cv-50231

MIGUEL PAREDES,  
PRUDENT FIDUCIARY SERVICES, LLC,  
a California Limited Liability Company,  
TIMOTHY P. SUTER,  
GEORGE B. SUTER, and  
DANIEL B. SUTER,

Defendants.

**DEFENDANTS' MOTION TO COMPEL ARBITRATION**

**TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE THAT** Defendants Miguel Paredes and Prudent Fiduciary Services, LLC (collectively "Defendants"), hereby move the Court for an order compelling arbitration pursuant to the Federal Arbitration Act, 9 U.S.C. § 1 *et seq.*, and staying all proceedings in the above-titled action pending conclusion of the arbitration. Pursuant to the scheduling notice on Judge Johnston's homepage, Defendants are not requesting a specific date to present this motion and will allow the Court to schedule this motion for presentment as it sees fit.

This motion is based on (1) this Notice of Motion, (2) the Memorandum of Points and Authorities in Support of Motion to Compel Arbitration, (3) the pleadings and papers on file, and (3) any other matter or material that the Court may properly consider.

Respectfully submitted,

Dated: August 30, 2023

FAEGRE DRINKER BIDDLE & REATH LLP

By: /s/ Richard J. Pearl

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*Attorneys for Defendants, Miguel Paredes and Prudent  
Fiduciary Services, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 30, 2023, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Richard J. Pearl

Richard J. Pearl